IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA *

*

v. * CRIMINAL NO. SAG-17-667

*

DAVON CARTER

*

RQEUEST TO FILE GOVERNMENT MOTION UNDER SEAL

The United States of America, by and through undersigned counsel, hereby files this request to file its Motion under seal. In support of this request, the government states as follows:

- 1. The government's Motion contains sensitive information and no reasonable alternative to sealing are available. Specifically, redaction of sensitive portions of the government's Motion would render the document substantially unreadable and would compromise counsel's ability to convey important information relevant to this case. Additionally, the interests in sealing outweigh the interests of disclosure on the docket. *See Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 63 (4th Cir. 1989) (describing standards for sealing)
- 2. Counsel will file a hard copy of the government's Motion with the Court (pursuant to Standing Order 2025-04) and intends to serve defense counsel with copies in compliance with Fed. R. Crim. P. 49(a)(3)(B) or (a)(4).

WHEREFORE, the Government respectfully requests that the Court grant the government's request to file its Motion under seal.

Respectfully submitted,

Kelly O. Hayes United States Attorney

Kim Y. Hagan Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing with the Court via CM/ECF, which sent a copy to counsel of record.

Kim Y. Hagan Assistant United States Attorney